

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Central District of California

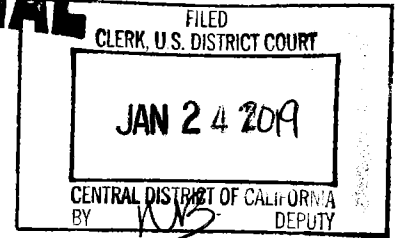
United States of America

v.

TYLER REEVES,

Defendant

Case No. 2:19-mj-00191

**ORIGINAL****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 30, 2018 in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section*

21 U.S.C. § 841(a)(1), (b)(1)(B)(viii)

*Offense Description*

Possession with intent to distribute methamphetamine

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

LODGED

2019 JAN 24 AM 11:05  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST OF CALIF  
SANTA ANA  
(AW)

Sworn to before me and signed in my presence.

Date:

1/24/2019

City and state: Santa Ana, California

Complainant's signature

Jason N. Lup, Special Agent

Printed name and title

DOUGLAS F. MCCORMICK

Judge's signature

Hon. Douglas F. McCormick,  
U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Jason N. Lup, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint against TYLER REEVES for a violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**II. BACKGROUND FOR SPECIAL AGENT JASON LUP**

3. I am a Special Agent ("SA") with the Drug Enforcement Administration ("DEA"), and have been so employed since November 2016. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7). I am empowered to conduct investigations of, and to make arrests for, federal felony offenses enumerated in 18 U.S.C. § 2516.

4. I am currently assigned to the Los Angeles Field Division ("LAFD"), Riverside District Office ("RDO"), in Riverside, California, and my responsibilities include investigating large-scale drug trafficking organizations

operating in the Southern California area and elsewhere. During the course of my employment, I have received approximately 300 hours of specialized training at the DEA Academy in Quantico, Virginia, on drug identification, detection, and interdiction, money laundering techniques, conspiracy investigations, and asset identification, seizure, and forfeiture.

5. I have executed numerous search warrants to seize evidence of violations of federal and state law, as well as arrest warrants to apprehend individuals who have committed such violations. Additionally, I have led and participated in numerous investigations and operations to detect and combat the importation, trafficking, distribution, and sales of drugs.

### **III. STATEMENT OF PROBABLE CAUSE**

#### **A. Identification of REEVES**

6. On April 2, 2018, RDO conducted physical surveillance at the United States Postal Service ("USPS") post office located at 5405 East Village Road, Long Beach, CA 90808. I was part of this surveillance and am aware of the following:

a. At approximately 11:30 a.m., surveillance observed a vehicle with a Colorado license plate park outside the post office.

b. During the operation, DEA SA Joseph Cox observed a younger white male (later identified to be REEVES, as described below) exit the vehicle with the Colorado plate holding four parcels, and walk into the post office.

7. On April 4, 2018, at approximately 2:13 p.m., agents captured camera footage of a younger white male (later

identified to be REEVES, as described below) delivering an additional two parcels at the same USPS post office in Long Beach, CA. Based on my review of that camera footage, I am aware of the following:

a. REEVES mailed the two parcels observed in his hands and paid in cash.

8. I queried databases of the California Department of Motor Vehicles ("DMV") and discovered that the vehicle (described above in ¶ 6) belonged to the Avis Rental Car Company. SA Cox advised me that, based on records provided by the Avis Rental Car Company, the car was rented at that time (including April 2, 2018) by Tyler REEVES at 18601 Airport Way, John Wayne, Orange County, APO, Santa Ana, CA, 92707.

9. I reviewed a DMV photograph for REEVES and positively identified him as the younger white male that is depicted in surveillance holding the parcels on April 4, 2018. SA Cox informed me that he reviewed the DMV photograph for REEVES and positively identified him as the younger white male that SA Cox observed on April 2, 2018.

**B. REEVES' Possession With Intent to Distribute Methamphetamine**

10. On May 30, 2018, I observed REEVES travel to the USPS post office at 5405 E. Village Road, Long Beach, CA 90808 where REEVES provided a parcel to the USPS (Parcel #1) for purposes of mailing.

11. I observed through camera footage for May 31, 2018, maintained by the USPS, REEVES attempt to mail another parcel (Parcel #2) at the Long Beach post office (the same as above).

12. On June 1, 2018, I obtained federal search warrants to search and seize Parcel #1 and Parcel #2. On June 4, 2018, I executed the search warrants, which resulted in a seizure of 5.22 grams of methamphetamine (Parcel #1) and 82 pills of amphetamine, pressed to appear as Adderall (Parcel #2). Subsequent analysis by DEA's Southwest Laboratory confirmed the methamphetamine as approximately 100% pure and the pills to be amphetamine with caffeine.

#### **C. Other Indications of Drug Trafficking**

13. On May 24, 2018, I inspected the trash at REEVES' residence. From the trash pull, I seized five pills of suspected amphetamine, a black bag containing suspected methamphetamine residue, and miscellaneous metal components suspected to be used for the manufacturing of guns and silencers to include an AR-15 style lower receiver. Analysis of the suspected methamphetamine residue by DEA's Southwest Laboratory confirmed the substance as methamphetamine. DEA's Southwest Laboratory reported that the five pills of suspected amphetamine were pressed to look like amphetamine but had no controlled substances.

#### **IV. CONCLUSION**

14. For all the reasons described above, there is probable cause to believe that REEVES has committed a violation of 21

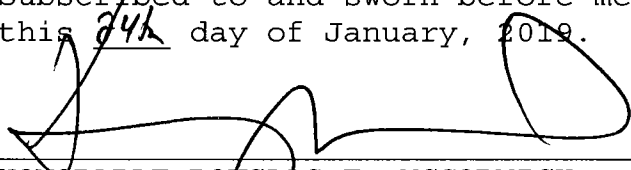
U.S.C. §§ 841(a)(1), (b)(1)(B)(viii) (possession with intent to distribute methamphetamine).



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JASON N. LUP, Special Agent  
DRUG ENFORCEMENT  
ADMINISTRATION

Subscribed to and sworn before me  
this 24<sup>th</sup> day of January, 2019.



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HONORABLE DOUGLAS F. MCCORMICK  
UNITED STATES MAGISTRATE JUDGE